



MOTOROLA

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August 7, 1998

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Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In Re: Ex Parte Communication
Motorola Inc
CC Docket 95-116

ORIGINAL

Dear Ms. Salas:

Attached, in duplicate is a copy of the written presentation that Motorola made to the staff of the Wireless Telecommunications Bureau on August 6, 1998. The presentation was made at the request of the Commercial Wireless Division staff. Participating from Motorola were myself and Tim Waldner. The discussion included technical and logistical issues regarding the implementation of Wireless Number Portability, which are of general concern to manufacturers.

Motorola requests that these copies be included in the record of this proceeding, pursuant to the provisions of Section 1.1206 of the Commission's rules.

Respectfully submitted,

Mary E. Brooner
Assistant Director
Telecommunications Strategy and Regulation
Corporate Government Relations

cc: Ms. Janice Jamison
Mr. Pieter van Leeuwen
Mr. Clint Odom
Ms. Jeanine Poltronieri

Enclosure

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MOTOROLA
Cellular Infrastructure Group

FCC Presentation to
Wireless Telecommunications Bureau

Wireless Number Portability

Docket CC 95-116 — August 6, 1998

Tim Waldner

Motorola Cellular Infrastructure Group
Network Solutions Sector

Mary Brooner

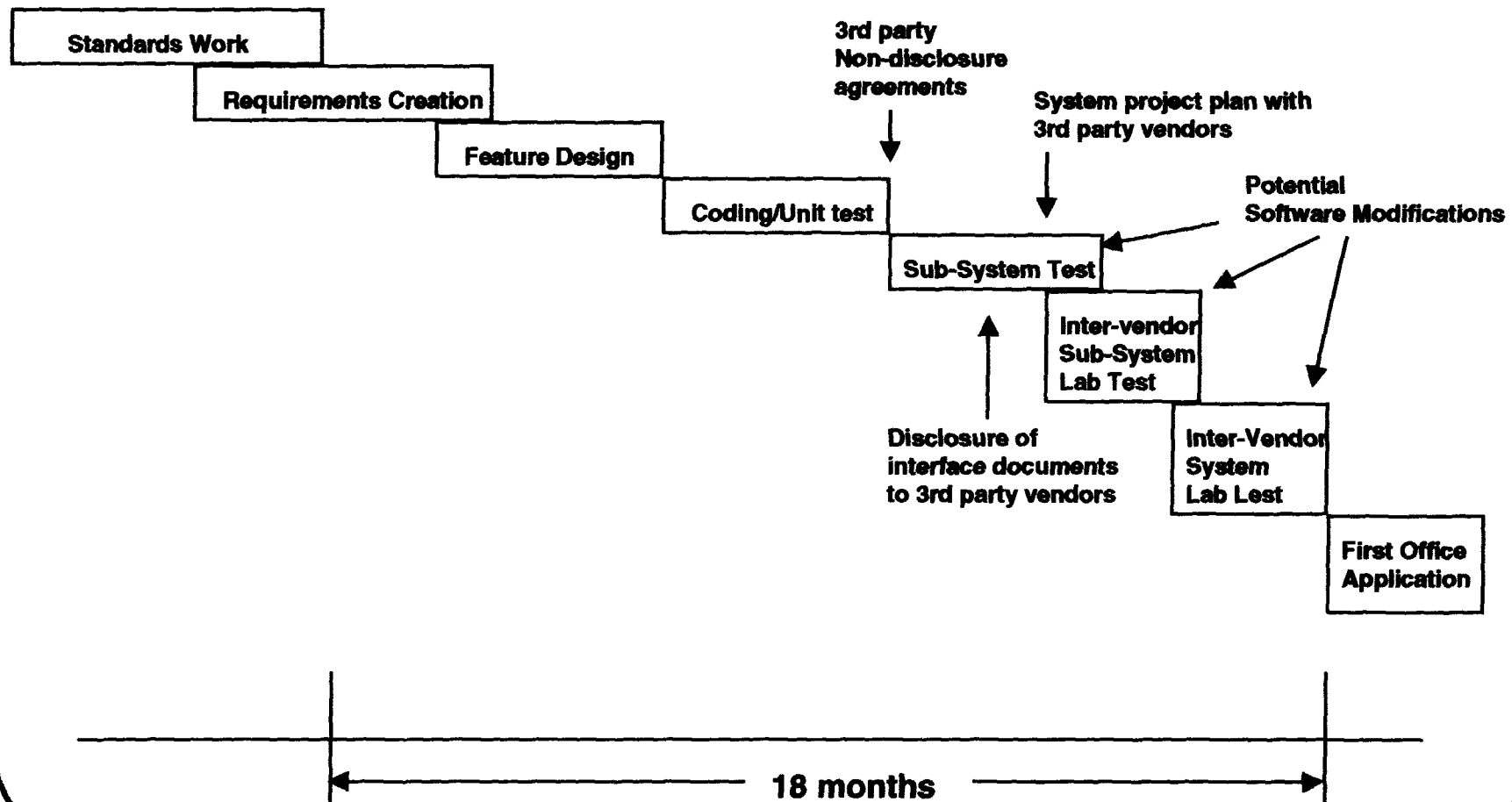
Motorola Government Relations Office



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Cellular Infrastructure Group

Multi-Vendor Solution Timeline





Issues of Concern

Technical Issues

- **WNP Phase 2 Standards will not be completed until 11/98**
 - Burden on infrastructure vendors to compress development schedule
 - 18 months standard, 12 months aggressive
- **Complete standards (WNP phase 2+) not available until 1999**
 - Not possible to incorporate these requirements into 1999 software
 - Short Message Service (a popular feature) will not work for ported numbers in 1998
- **Global Title Translation Translation Type for Location Query not standardized in T1S1**



Issues of Concern (cont'd)

Technical Issues

- **Roaming to Systems without WNP Support**
 - Some older cellular switches will not be technically capable of Number portability (phase 1 or phase 2)
 - Resulting feature problems
 - CNIP
 - Emergency Callback
 - ANI for billing
- **Billing Standards Not Finalized**
 - IS-124 has not been changed yet for WNP MIN/MDN separation
 - Billing vendors usually have 9-12 month development cycles
 - Billing vendor development cycles usually start after receipt of exact format/structure information from switch vendor



Issues of Concern (cont'd)

Logistical Issues

- **Complexity of WNP Solution is High due to Multiple Vendor Involvement**
 - Operators will choose from many NPDB vendors and billing vendors
 - Switch vendor cannot force choice of third-party vendor
 - Each multiple vendor combination introduces additional testing /verification and time to national roll-out
 - Operators will want to go slow with this complex of a project and will likely demand on-site from switch vendor for initial implementations
- **Time from FOA to National Rollout is Significant**
 - Each new implementation will be its own multi-month project
 - Each operator typically lets new switch release run on one switch for 1-2 months before larger deployment
 - Time from first installation to nationwide roll-out could surpass 1 year
 - Resources to support a more rapid implementation may be limited